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1 on a per-region basis, *one or more values associated with one or*  
2 *more picture-level parameters*; and

- 3 • adding of the first quantity of residual samples to the prediction to  
4 generate a refined prediction value, when so indicated; and
- 5 • subtracting the second quantity of residual samples from the refined  
6 prediction value to generate a final representation, when so  
7 indicated.

8 In making out the rejection of this claim, the Office argues that Radha  
9 discloses all of the subject matter of this claim except for subtracting the second  
10 quantity of residual samples from the refined prediction value. For this feature,  
11 the Office relies on Rose and argues that its combination with Radha would render  
12 the subject matter of this claim obvious. The Office argues that the motivation to  
13 combine the teachings of these references would be to “obtain an apparatus that  
14 operates more efficiently by being able to take advantage of addition information  
15 given to a system.”

16 Applicant respectfully traverses this rejection and submits that the Office  
17 has not established a *prima facie* case of obviousness. First, Applicant submits  
18 that the references do not collectively disclose all of the subject matter of this  
19 claim. For example, Radha does not disclose “receiving an *indication* of whether  
20 there are first and second quantities of residual samples remaining *for refining the*  
21 *prediction, on a per-region basis*” and Rose does not disclose “subtracting the  
22 second quantity of residual samples from the refined prediction value *to generate*  
23 *a final representation*, when so indicated”.

24 Second, as Applicant respectfully submitted in its last response, filed  
25 October 25, 2006, the Office’s stated motivation (to improve efficiency) is too  
general because it could cover almost any alteration contemplated of Radha and

1 does not address *why* this specific proposed modification would have been  
2 obvious.

3 Nevertheless, in the interest of advancing prosecution, Applicant has  
4 amended this claim to clarify that “*the indication comprises one or more values*  
5 *associated with one or more picture-level parameters*”. To support this  
6 clarification, Applicant directs the Office’s attention to the discussion regarding  
7 Operational Data Structure(s), starting on page 23 of the subject application and,  
8 more specifically, to page 59 of the subject application.

9 In view of the above discussion, the Office has not established a *prima*  
10 *facie* case of obviousness. Hence, for at least these reasons, this claim is  
11 allowable.

12 **Claims 2-9** depend from claim 1 and are allowable as depending from an  
13 allowable base claim. These claims are also allowable for their own recited  
14 features which, in combination with those recited in claim 1, are neither disclosed  
15 nor suggested in the references of record, either singly or in combination with one  
16 another.

17 Additionally, regarding claims 4 and 7, Applicant respectfully submits that  
18 the Office’s reliance on what the region of content in Radha “could comprise” is  
19 misplaced because to establish a *prima facie* case of obviousness, the prior art  
20 reference (or references when combined) must teach or suggest all the claim  
21 limitations. (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)).  
22 Furthermore, the Office has not provided any motivation as to *why* an artisan  
23 would have utilized a macroblock with respect to the region of content.  
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1       **Claim 10, as amended**, recites a medium comprising a plurality of  
2 executable instructions which, when executed, implement a decoder of media  
3 content to generate a motion compensated prediction of at least a region of media  
4 content, to receive an indication of one or more sets of samples of residual  
5 information to further refine the prediction, *wherein the indication comprises one*  
6 *or more values associated with one or more picture-level parameters*, and to add  
7 a first set of such samples to the prediction to generate a modified prediction, if  
8 indicated, and to subtract a second set of such samples from the modified  
9 prediction to generate a final motion compensated prediction of the region, if  
10 indicated [added language in bold italics].

11       In making out the rejection of this claim, the Office relies on the same  
12 argument that it made with respect to claim 1. Therefore, for the reasons set forth  
13 above, applicant respectfully traverses this rejection. Nevertheless, in the interest  
14 of advancing prosecution, Applicant has amended this claim to clarify that “*the*  
15 *indication comprises one or more values associated with one or more picture-*  
16 *level parameters*”. As noted above, neither Radha nor Rose disclose or suggest  
17 this subject matter.

18       Accordingly, in view of the above discussion, the Office has not established  
19 a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is  
20 allowable.

21       **Claims 11-14** depend from claim 10 and are allowable as depending from  
22 an allowable base claim. These claims are also allowable for their own recited  
23 features which, in combination with those recited in claim 10, are neither disclosed  
24 nor suggested in the references of record, either singly or in combination with one  
25 another.

1        Additionally, regarding claim 12, Applicant respectfully submits that the  
2        Office's reliance on what the region of content in Radha "could comprise" is  
3        misplaced. Furthermore, the Office has not provided any motivation as to why an  
4        artisan would have utilized a macroblock with respect to the region of content.

5        **Claim 15** recites a computing system comprising:

- 6        • a decoder application to receive a region of media content and  
7        control generation of decoded media content; and
- 8        • an application program interface (API), communicatively coupling  
9        the decoder application with a hardware accelerator, wherein if the  
10        API receives an indication of one or more sets of residual samples,  
11        the first set of samples is added to a motion compensated prediction  
12        to generate a refinement of a prediction value, when so indicated,  
13        and a second set of samples is subtracted from the refined prediction  
14        value to generate a final representation, when so indicated.

15        In making out the rejection of this claim, the Office relies on the same  
16        argument that it made with respect to claims 1 and 15. In addition, the Office  
17        argues that Fig. 10 (blocks 52 and 54) of Radha discloses a hardware accelerator  
18        and Column 9 (lines 57-59) discloses an application program interface (API), as  
19        claimed.

20        Applicant traverses this rejection and respectfully submits that for all of the  
21        reasons set forth above, the Office has failed to establish a *prima facie* case of  
22        obviousness. Perhaps more importantly, Column 9 (lines 57-59) of Radha simply  
23        does not disclose an "application program interface (API), communicatively  
24        coupling the decoder application with a hardware accelerator", as claimed. This is  
25        not surprising because blocks 52 and 54, depicted in Fig. 10, do not disclose or  
26        suggest a "hardware accelerator", as claimed. Furthermore, even if these blocks

1 did disclose a "hardware accelerator", which they do not, they are actually part of  
2 the decoder itself. (see Fig. 10 and column 9, lines 64-67 through column 10,  
3 lines 1-7).

4 Accordingly, in view of the above discussion, the Office has not established  
5 a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is  
6 allowable.

7 **Claims 16-20** depend from claim 15 and are allowable as depending from  
8 an allowable base claim. These claims are also allowable for their own recited  
9 features which, in combination with those recited in claim 15, are neither disclosed  
10 nor suggested in the references of record, either singly or in combination with one  
11 another.

12 Additionally, regarding claim 18, Applicant respectfully submits that the  
13 Office's reliance on what the region of content in Radha "could comprise" is  
14 misplaced. Furthermore, the Office has not provided any motivation as to **why** an  
15 artisan would have utilized a macroblock with respect to the region of content.

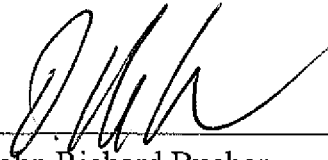
### 17 **Conclusion**

18 All of the claims are in condition for allowance. Accordingly, Applicant  
19 requests a Notice of Allowability be issued forthwith. If the Office's next  
20 anticipated action is to be anything other than issuance of a Notice of Allowability,  
21 Applicant respectfully requests a telephone call for the purpose of scheduling an  
22 interview.

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Respectfully Submitted,

Dated: 6/22/2006

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